

**UNITED STATES COURT OF APPEALS
For the Ninth Circuit**

No. 24-6708

CYRUS SANAI,

Plaintiff and Appellant

vs.

GEORGE CARDONA, et. al, .

Defendants and Appellees

Appeal from a Decision of the United States District Court
for the Northern District of California, Case No. 22-cv-01818-JST,
Honorable Jon Tigar, District Judge Presiding

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF**

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UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

I. MOTION

Appellant Cyrus Sanai hereby moves this Court for an extension of time to file an opening brief from July 16, 2025 to August 4, 2025 .

Opposing counsel has consented to this extension.

II. FACTUAL BACKGROUND

This case is an appeal of judgment of dismissal without prejudice of a lawsuit attacking State Bar proceedings. The opening brief was originally scheduled to be filed by December 16, 2024, and then extended by streamlined motion to January 15, 2025. Sanai Decl. ¶3. The Court then granted an unopposed motion to extend the time to file to March 16, 2025. It further granted an unopposed extension to July 16, 2025 to allow for the filing and resolution of two indicative motions, which has been accomplished. *Id.*

III. WHY AN EXTENSION IS NEEDED

The District Court as expected denied the indicative motion. In doing so it ruled, at the suggestion of Defendants, that it was not

necessary for it to rule as the issues were legal and would be reviewed de novo. This is a fine result from Appellant's point of view, but the question that Appellant is still researching is whether this finding is binding on appeal. Sanai requests an extra three weeks to finish reviewing the authority on this unanticipated issue. Since there is no opposition, the requests should be granted, and the due date for the reply brief extended appropriately.

Dated: July 9, 2025

SANAIS

By: s Cyrus Sanai
Appellant
In Pro Per

CERTIFICATE OF COMPLIANCE

I certify that the foregoing motion is double spaced (except for quotations in excess of 49 words from legal authorities and the record) and utilizes a proportionately spaced 14-point typeface. The motion (excluding the Declaration, Cover, and Certificate of Compliance) comprises a total of two pages.

Dated: March 7, 2025

By: /s/ Cyrus Sanai
Appellant
In Pro Per

DECLARATION OF CYRUS SANAI

1. I am an attorney admitted in California and to this Court. The following matters are from personal knowledge.
2. This case is an appeal of judgment of dismissal without prejudice on *Younger* abstention grounds.
3. The opening brief in this case was originally due on December 16, 2024. This Court granted one streamlined request, which extended the deadline January 15, 2025. The Court then granted an unopposed motion to extend the time to file to March 16, 2025. It further granted an unopposed extension to July 16, 2025 to allow for the filing and resolution of two indicative motions, which has been accomplished. *Id.*
4. I have exercised diligence.
5. Opposing counsel has been asked her view by email on the extension and she responded that the Defendants consent to an extension to August 4, 2025, accompanied by an appropriate extension for the opposition brief.
6. There was no oral argument in the underlying proceedings, so

there is no transcript to be submitted.

I declare, under penalty of perjury of the law of the United States
that the foregoing statements of fact are true and correct.

Dated this July 9, 2025 in Beverly Hills, California

s/ Cyrus Sanai

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